

## **MEMORANDUM**

DATE: June 2, 2006

TO: Oil Spill Advisory Council  
Rob Frazier, Environmental International, Inc.

FROM: Jacqui Brown Miller, Research & Policy Director  
Oil Spill Advisory Council

SUBJECT: Recommendations of the full Council relating to Improving Washington's Escort and Response Tug System, based on recommendations to the Council by the Tug Technical Advisory Committee

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### **I. Introduction**

On May 18, 2006, the Washington Oil Spill Advisory Council reviewed recommendations made to it from the Tug Technical Advisory Committee ("TAC"), which was formed at the Council's March 2006 meeting. This memo reflects the recommendations of the Tug TAC that were adopted by the full Council.

Please include this information in your prevention report that you will deliver to the Council in early July.

### **II. Composition of Tug Technical Advisory Committee**

The Committee is comprised of Stuart Downer, Council Member and Chair; Jim Davis, Council Member; Mike Doherty, Council Member; Bruce Wishart, Lobbyist for People for Puget Sound; Captain Andy Coe, Puget Sound Pilots; and Chad Bowechop, Makah Tribe.

Others who participated in the discussions were Norm Davis, Washington State Department of Ecology ("WDOE"); Jon Neel, WDOE; Frank Holmes, Western States Petroleum Association ("WSPA"); Greg Hanon, WSPA; Ed Irish, WSPA; John Veentjer, Pacific Merchant Shippers Association; Matt Brown, Foss Maritime; Richard Rodger, Senate Water, Energy and Environment staff; Jason Tama, U.S. Coast Guard; Rich Berkowitz, Transportation Institute; Fred Felleman, Ocean Advocates; Jeff Shaw, Council Member; David Sawicki, BP; and Craig Lee, a member of the public.

### **III. Charge of the Tug Technical Advisory Committee; New Standing Committee**

In keeping with the Council's mandate of a "State of the Art" and zero-spill prevention program for Washington, the TAC was charged with the task of recommending changes to Washington's escort and rescue tug systems. The TAC was charged with reviewing the universe of reports available on escort and rescue tugs. The

committee was to provide critical analysis of these reports and articulate recommendations to the Council that will support the Council's deliberations on the escort tug and rescue tug issues. The specific subjects this TAC was charged to study and make recommendations about include:

- instituting cost-effective placement of rescue tugs in strategic locations;
- changes to the escort tug program; and
- ways to ensure continual funding of the Neah Bay rescue tug.

Because this charge is quite large, this TAC was unable to complete a full analysis of the above issues in the timeframe afforded to it—March 20 to May 17, 2006. The Council-approved recommendations that appear below reflect the work the TAC could do. For the rest, the TAC recommended that the Council make it a standing committee. The Council adopted this recommendation and the Tug TAC will continue to meet through and beyond this year as a standing committee.

The standing Tug TAC will review all changes in regulations, vessel traffic, and all other changes that could affect vessel escorting, response/rescue vessels, as well as spill response vessels. The TAC will make recommendations to the Council on possible actions that would be needed because of those changes. The TAC will continually review current practices, equipment types, crew training, and equipment locations in order to ensure the establishment of a state-of-the-art prevention and response program. It will also make recommendations on additional studies and funding requirements in order to maintain the best possible system of prevention for the citizens of the Washington State.

#### **IV. Council approved recommendations of the Tug TAC**

##### **A. Neah Bay Tug- Duration and Funding**

The Council recommends that there be a fully funded, year-round "Straits and Coastal Waters Response/Rescue Tug," at or near Neah Bay, Washington. The primary mission of this dedicated straits and coastal waters response/rescue tug should be standing by and responding, and, when needed, providing towing services for disabled or drifting vessels in order to prevent pollution events.

This vessel should be a state-of-the-art vessel. It should also be of sufficient power, maneuverability, and deck configuration to enable it to timely respond to any vessel, within the response area, in sea-state conditions up to and including extreme weather. The response area of operation should encompass the Pacific Coast of the State of Washington, along with all "Marine Waters" within 60 nautical miles from Buoy "J" at the entrance to the Strait of Juan de Fuca, the Strait, and its western approaches.

In addition, the vessel should have secondary capabilities of the following, as long as the primary service of the tug is not compromised or jeopardized:

- spill response;
- firefighting; and

- early salvage capabilities, as part of a critical partner of a salvage company.

## **B. Other Response Tugs; Location, Duration, and Funding**

Even with the International Tug of Opportunity System (“ITOS”), current oil tanker escorts, and a year-round response/rescue tug stationed at Neah Bay, there are still several high-risk locations that could require additional safeguards in order to achieve state-of-the-art prevention. In particular, the following areas could benefit from the placement of additional response/rescue tugs:

- Haro Strait/Boundary Pass;
- the southern Washington coast; and
- the Columbia River area.

These areas have a deficiency of available and capable tugs operating on a regular basis under ITOS. These areas were identified as high risk due to significant navigational hazards, vessel traffic, as well as being areas of important natural resources to the state.

Therefore, it is recommended that the Tug TAC perform additional studies and information-gathering to assist the Council in making final recommendations on whether it would be beneficial to place additional rescue/ response tugs in Washington’s waters.

The TAC recommended establishing a Department of Ecology managed “Tug Fund” to allow placing additional response/rescue tug(s) at strategic locations based on the outcome of the additional studies. The Council chose not to make this recommendation and, instead, asked for further discussion of this issue.

The Council accepted the TAC’s recommendation that an update be done on the many existing response/rescue tug studies and that this study contain all up-to-date information, including the effect of the Standards of Training for Certified Watch, industry voluntary upgrades, and new U.S. Coast Guard requirements. It would be important to determine whether any of these new standards would have any effect on the placement of current or future tug resources.

## **C. Escort tugs**

As there was little time to study this issue, the Tug TAC, as a standing committee, will continue studying tug escort issues, in particular those related to human factors.

The Tug TAC discussed the current tug escort regulations for oil tankers traveling east of Port Angeles and recommended that the Council recommend no changes to these regulations at this time.

As for all other vessels and all other locations, the Tug TAC will determine whether additional escort requirements for other vessels, in particular the location and length of escorts, should be recommended. The Tug TAC is particularly interested in studying other tank vessels (tank barges- both ATB and towed), petroleum or chemical

product tankers, and other vessels such as foreign flagged vessels, bulk carriers, and cargo carriers. The standing Tug TAC would also like to review all regulatory changes that would impact current escort requirements, and make recommendations to the Council on those changes and their impact to the State's zero-spill prevention program. The Council agrees with this approach.

#### **D. International Tug of Opportunity System**

ITOS is “a good tool to have in the tool box,” but is not something on which to rely completely. Tugs may not abandon a tow to be a primary rescue tug, and they cannot be relied on to be “in the right place at the right time,” with or without tows, so as to be a critical part of a state-of-the-art or zero-spill program.

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